

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

| | | |
|---------------------------------|----------|--|
| UNITED STATES OF AMERICA | : | CRIMINAL NO. _____ |
| v. | : | DATE FILED: _____ |
| DAVID DUNN | : | VIOLATIONS: |
| | : | 18 U.S.C. § 2251(a), (e) (manufacture and attempted manufacture of child |
| | : | pornography – 1 count) |
| | : | 18 U.S.C. § 2252(a)(2), (b)(1) (distribution and attempted distribution of child |
| | : | pornography – 1 count) |
| | : | 18 U.S.C. § 2252(a)(4)(B), (b)(2) (possession of child pornography – 1 |
| | : | count) |
| | | Notice of forfeiture |

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

On or about August 23, 2022, in Montgomery County, in the Eastern District of Pennsylvania, and elsewhere, defendant

DAVID DUNN

employed, used, persuaded, induced, enticed, and coerced Minor #1, a person known to the grand jury, to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, and attempted to do so, and defendant DAVID DUNN knew and had reason to know that the visual depiction would be transported and transmitted using a facility of interstate and foreign commerce and in and affecting interstate and foreign commerce, and the visual depiction was produced and transmitted using materials that had been mailed and shipped and transported in and affecting interstate or foreign commerce by any means including by computer,

and such visual depiction was actually transported and transmitted using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce.

In violation of Title 18, United States Code, Sections 2251(a), (e).

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

On or about August 23, 2022, in Montgomery County, in the Eastern District of Pennsylvania, and elsewhere, defendant

DAVID DUNN

knowingly distributed a visual depiction, and attempted to do so, using any means and facility of interstate and foreign commerce, and that had been mailed and shipped and transported in and affecting interstate and foreign commerce by any means, including by computer, and which contained materials that had been mailed and shipped and transported in and affecting interstate and foreign commerce by any means, including by computer, the producing of which involved the use of minors engaged in sexually explicit conduct, and the visual depictions were of such conduct.

In violation of Title 18, United States Code, Sections 2252(a)(2), (b)(1).

COUNT THREE

THE GRAND JURY FURTHER CHARGES THAT:

On or about December 13, 2022, in Montgomery County, in the Eastern District of Pennsylvania, and elsewhere, defendant

DAVID DUNN

knowingly possessed matter, that is, a Samsung Galaxy cellular phone, model SM-S908U, bearing serial number RFCT41YPQ8L, a Samsung Galaxy cellular phone, model SM-G955U, bearing serial number R38K60BT1NE, and Telegram and Snapchat accounts, which contained visual depictions that had been mailed and shipped and transported using any means and facility of in interstate and foreign commerce and in and affecting interstate and foreign commerce, and that were produced using materials that had been mailed and shipped and transported in interstate and foreign commerce. The production of these visual depictions involved the use of minors engaging in sexually explicit conduct and the visual depictions were of such conduct. The visual depictions included prepubescent minors and minors who had not attained 12 years of age.

In violation of Title 18, United States Code, Sections 2252(a)(4)(B), (b)(2).

NOTICE OF FORFEITURE

THE GRAND JURY FURTHER CHARGES THAT:

1. As a result of the violations of Title 18, United States Code, Sections 2251(a), 2252(a)(2), and 2252(a)(4)(B), as set forth in this indictment, defendant

DAVID DUNN

shall forfeit to the United States of America:

(a) any visual depiction, or any film, videotape, or other matter which contains any child pornography, which was produced, transported, mailed, shipped, or received as a result of such violations as charged in the superseding indictment;

(b) any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from such violations; and

(c) any property, real or personal, used or intended to be used to commit or to promote the commission of such violations, including, but not limited to:

- i. a Samsung cell phone, model number SM-S908U, bearing serial number RFCT41YPQ8L; and
- ii. a Samsung cell phone, model number SM-G955U, bearing serial number R38K60BT1NE.

2. If any of the property subject to forfeiture, as a result of any act or omission of the defendant:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the Court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be divided

without difficulty;

it is the intent of the United States, pursuant to Title 18, United States Code, Section 2253(b), incorporating Title 21, United States Code, Section 853(p), and Title 28, United States Code, Section 2461(c), incorporating Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant up to the value of the property subject to forfeiture.

Pursuant to Title 18, United States Code, Sections 2428 and 2253.

[REDACTED]
GRAND JURY FOREPERSON

A handwritten signature in black ink, appearing to read "JCR /for", is written over a horizontal line.

JACQUELINE C. ROMERO
United States Attorney

No. _____

UNITED STATES DISTRICT COURT

Eastern District of Pennsylvania

Criminal Division

THE UNITED STATES OF AMERICA

vs.

DAVID DUNN

Indictment

Counts

18 U.S.C. § 2251(a), (e) (manufacture and attempted manufacture of child pornography – 1 count)
18 U.S.C. § 2252(a)(2), (b)(1) (distribution and attempted distribution of child pornography – 1 count)
18 U.S.C. § 2252(a)(4)(B), (b)(2) (possession of child pornography – 1 count)

Notice of forfeiture

A true bill

Filed in open court this 12 day,
Of January A.D. 20 23

Clerk

Bail, \$ _____